

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

KRAFT FOODS GLOBAL, INC., THE	)	
KELLOGG COMPANY, GENERAL	)	
MILLS, INC., and NESTLÉ USA,	)	
INC.,	)	
	)	No. 1:11-cv-08808
Plaintiffs,	)	
	)	Judge Steven C. Seeger
v.	)	
	)	
UNITED EGG PRODUCERS, INC.,	)	
UNITED STATES EGG	)	
MARKETERS, INC., CAL-MAINE	)	
FOODS, INC., MICHAEL FOODS	)	
INC., and ROSE ACRE FARMS, INC.,	)	
	)	
Defendants.	)	

**Motion for Leave to File Under Seal Exhibit to Motion to Exclude In-Trial Expansion of Defined Conspiracy**

Defendants United Egg Producers, Inc., United States Egg Marketers, Inc., Cal-Maine Foods, Inc., and Rose Acre Farms, Inc., hereby file this Motion for Leave to File Under Seal Exhibit 2 to Defendants' Motion to Exclude In-Trial Expansion of Defined Conspiracy and state as follows:

1. Exhibit 2, Motion for Clarification and Other Relief (D.E. #1948), *In re Processed Egg Prod. Antitrust Litig.*, No. 08-md-02002 (E.D. Pa.), was filed under seal (and remains sealed on the docket) pursuant to Judge Pratter's Case Management Order No. 10 (D.E # 50). Exhibit 2 also cites to other filings before Judge Pratter that had previously been sealed.

2. Exhibit 2 cites information produced by parties and third parties that

those parties marked confidential and highly confidential pursuant to Case Management Order No. 10. These confidentiality designations mean that Exhibit 2 contains information that constitutes confidential commercial information, personal information not generally disclosed to the public, competitively sensitive materials, or trade secrets.

3. Accordingly, Defendants request leave to file Exhibit 2 under seal.

### **Conclusion**

Defendants respectfully request that this Court grant their Motion for Leave and grant them all such other and further relief this Court deems appropriate.

Dated: October 28, 2023

Respectfully submitted,

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